

Reading file



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

January 10, 1997

Terri Knutson
Bureau of Land Management
1535 Hot Springs Road
Carson City, NV 89706

Dear Ms. Knutson:

The U.S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the **Denton-Rawhide Mine Expansion Project, Mineral County, Nevada**. Our review and comments are provided pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's NEPA Implementation Regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

The DEIS analyzes impacts of alternatives for expanding the Denton-Rawhide gold mine. The proposed action includes expansion of an open pit and waste rock pile, construction and operation of a heap leach facility and other ancillary facilities, and reclamation. The BLM-preferred alternative is Alternative A, partial backfilling of the Murray Hill pit. The expansion would add approximately five years to the active mine life of the Denton-Rawhide Mine.

Based on our review of this project, we have rated this DEIS as LO -- Lack of Objections (see the enclosed "Summary of Rating Definitions and Follow-Up Actions"). We do, however, have the following comments regarding geochemical characterization of waste rock and biological resources.

We note that the DEIS states that an Acid Neutralizing Potential to Acid Generation Potential (ANP:AGP) of 1.2:1 was used as the threshold for non-acid generating material for this project. We understand, however, that the BLM Nevada State Office has adopted a policy to use 3:1 ANP:AGP as the threshold below which material may be considered potentially acid generating and analyzed and/or treated accordingly. EPA supports the BLM State Office's use of a 3:1 threshold and understood that this would be used by all district offices in Nevada.

We also understand that the revegetation goal for this project is only 50 percent because revegetation at this site has

been difficult due to edaphic and climatic conditions. However, we urge BLM to require the mining company to make every effort to return disturbed surfaces to as natural a state as possible, ideally targeting a goal of closer to 100 percent revegetation over a reasonable amount of time.

We appreciate the opportunity to review this DEIS. Please send a copy of the Final Environmental Impact Statement to this office when it is officially filed with our Washington, D.C., office. If you have any questions, please call me at (415) 744-1584 or Jeanne Geselbracht of my staff at (415) 744-1576.

Sincerely,

A handwritten signature in black ink, appearing to read 'David J. Farrel', with a long horizontal line extending to the right.

David J. Farrel, Chief
Federal Activities Office

002621/96-373

Enclosure

cc: NDEP, Bureau of Mining Regulations and Reclamation